

MAY-11-2007 17:34

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHEILA CLEVELAND et al.,

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendants.

No. C 06-3853 PJH
E-Filing Case

STIPULATION EXTENDING TIME FOR
DISCOVERY
~~PROPOSED ORDER~~

The following is hereby stipulated by and between the undersigned, subject to the approval of the Court: the date for the close of fact discovery previously set for June 15, 2007 is enlarged to **July 20, 2006**, the date for filing of summary judgment motions previously set for July 18, 2007 is enlarged to **August 22, 2007** (hearing on September 26, 2007), and the date to complete mediation previously set for September 21, 2007 is enlarged to **October 26, 2007**.

An extension is required because the majority of the witnesses are located in Crescent City, California. Because of this geographic distance, identification of proper deponents and scheduling of depositions there is time consuming.

This is the first request for an extension of time for discovery. The trial date has not been calendarized, therefore, this enlargement of time for discovery will not cause delay in the trial timing. In addition, the parties have already agreed on a private mediator in the event that the summary

MAY-11-2007 17:34

1 judgment motion is not granted.

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3 DATED: 5/14/07


4 By:


MICHAEL HENDERSON
Attorney for Plaintiff

5
6 SCOTT N. SCHOOLS
United States Attorney

7
8 DATED: 5-11-07

9 By:


KATHERINE B. DOWLING
Assistant United States Attorney
Attorneys for Defendant

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11 PURSUANT TO STIPULATION, IT IS SO ORDERED:

12
13 DATED: 05/15/07

14 HONORABLE PHYLLIS J. HAMILTON
UNITED STATES DISTRICT COURT JUDGE

